

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JAMIE SMICHERKO,  
PATRICK RUSSIN,  
RYAN MEDAR, and  
CARLOS LAUREL,  
Defendants.

CR. NO. 3:24-CR-

(Judge )

INDICTMENT

FILED  
SCRANTON

APR 09 2024

THE GRAND JURY CHARGES:

PER Cp  
DEPUTY CLERK

COUNT 1

21 U.S.C. § 846

(Conspiracy to Distribute and Possess with Intent to Distribute  
Controlled Substances)

From on or about October 25, 2023, and continuing to on or about  
April 4, 2024, in Luzerne County, in the Middle District of Pennsylvania,  
and elsewhere, the defendants,

**JAMIE SMICHERKO, PATRICK RUSSIN, RYAN MEDAR,  
and CARLOS LAUREL,**

did knowingly, intentionally, and unlawfully, combine, conspire,  
confederate, and agree with each other and with other persons known and  
unknown to the Grand Jury to commit the following offenses against the  
United States: to knowingly, intentionally, and unlawfully distribute and

possess with intent to distribute controlled substances, in violation of 21 U.S.C. Sections 841(a)(1), 841(b)(1)(B), 841(b)(1)(C).

**QUANTITY OF CONTROLLED SUBSTANCES INVOLVED IN THE CONSPIRACY**

The amount of controlled substances involved in the conspiracy that is attributable to each of the defendants as a result of his or her own conduct, and the conduct of other co-conspirators reasonably foreseeable to him or her, is as follows:

1. **JAMIE SMICHERKO:** an unspecified amount of methamphetamine and cocaine, both Schedule II controlled substances.

2. **PATRICK RUSSIN:** in excess of 50 grams of a mixture and substance containing a detectable amount of methamphetamine and an unspecified amount of cocaine, both Schedule II controlled substances.

3. **RYAN MEDAR:** in excess of 50 grams of a mixture and substance containing a detectable amount of methamphetamine and an unspecified amount of cocaine, both Schedule II controlled substances.

4. **CARLOS LAUREL:** an unspecified amount of cocaine, a Schedule II controlled substance.

Before **PATRICK RUSSIN** committed the offense charged in this Count, **PATRICK RUSSIN** had a final conviction for a serious violent

felony, namely a conviction under 18 Pa. C.S.A. §3701(a)(1)(ii), Robbery, (Case No. CP-40-CR-3356-2003), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(B), and (C).

THE GRAND JURY FURTHER CHARGES:

**COUNT 2**  
18 U.S.C. § 924(o)  
(Firearms Conspiracy)

From on or about September 5, 2023, and continuing to on or about April 1, 2024, in Luzerne County, in the Middle District of Pennsylvania, and elsewhere, the defendants,

**JAMIE SMICHERKO and RYAN MEDAR,**

did knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to knowingly and intentionally possess firearms in furtherance of a drug trafficking crime, that is the distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), for which they

may be prosecuted in a court of the United States, in violation of Title 18, United States Code, Section 924(c).

All in violation of Title 18, United States Code, Section 924(o).

THE GRAND JURY FURTHER CHARGES:

**COUNT 3**  
18 U.S.C. § 933(a)(1)  
(Firearms Trafficking)

On or about September 5, 2023, in Lackawanna County, within the Middle District of Pennsylvania, the defendant,

**JAMIE SMICHERKO,**

did transfer a firearm, namely a black Taurus 1911 .45 caliber pistol, Serial Number ADH633998, to another person, known to the Grand Jury, in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, or possession of the firearm by said person, known to the Grand Jury, would constitute a felony.

In violation of Title 18, United States Code, Section 933(a)(1).

THE GRAND JURY FURTHER CHARGES:

**COUNT 4**  
18 U.S.C. § 922(j)  
(Sale of Stolen Firearm)

On or about September 5, 2023, in Lackawanna County, within the Middle District of Pennsylvania, the defendant,

**JAMIE SMICHERKO,**

knowingly sold a stolen firearm, that is, a black Taurus 1911 .45 caliber pistol, Serial Number ADH633998, which had been shipped and transported in interstate commerce, knowing and having reasonable cause to believe the firearm was stolen.

In violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

**COUNT 5**  
21 U.S.C. § 841(a)(1)  
(Distribution of Methamphetamine)

On or about October 25, 2023, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

**JAMIE SMICHERKO,**

did knowingly and intentionally distribute and possess with intent to distribute methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

**COUNT 6**  
18 U.S.C. § 933(a)(1)  
(Firearms Trafficking)

On or about February 27, 2024, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

**JAMIE SMICHERKO,**

did transfer a firearm, namely a brown Glock 19X 9mm pistol, Serial Number BRRA692, to another person, known to the Grand Jury, in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, or possession of the firearm by said person, known to the Grand Jury, would constitute a felony.

In violation of Title 18, United States Code, Section 933(a)(1).

THE GRAND JURY FURTHER CHARGES:

**COUNT 7**  
18 U.S.C. § 922(j)  
(Sale of Stolen Firearm)

On or about February 27, 2024, in Luzerne County, within the  
Middle District of Pennsylvania, the defendant,

**JAMIE SMICHERKO,**

knowingly sold a stolen firearm, that is, a brown Glock 19X 9mm pistol,  
Serial Number BRRA692, which had been shipped and transported in  
interstate commerce, knowing and having reasonable cause to believe the  
firearm was stolen.

In violation of Title 18, United States Code, Sections 922(j) and  
924(a)(2).

THE GRAND JURY FURTHER CHARGES:

**COUNT 8**  
21 U.S.C. § 841(a)(1)  
(Distribution of LSD)

On or about February 27, 2024, in Luzerne County, within the  
Middle District of Pennsylvania, the defendant,

**JAMIE SMICHERKO,**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of lysergic acid diethylamide (“LSD”), a Schedule I Controlled Substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

**COUNT 9**

18 U.S.C. § 924(c)

(Use and Carrying a Firearm During and in Relation to a Drug Trafficking Crime)

On or about February 27, 2024, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

**JAMIE SMICHERKO,**

did knowingly carry and use a firearm, namely, a brown Glock 19X 9mm pistol, Serial Number BRRA692, during and in relation to a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, the distribution of a controlled substance, in violation of 21, U.S.C. Section 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c).



THE GRAND JURY FURTHER CHARGES:

**COUNT 10**

21 U.S.C. § 841(a)(1)  
(Distribution of Methamphetamine)

On or about March 18, 2024, in Luzerne County, within the Middle  
District of Pennsylvania, the defendant,

**RYAN MEDAR,**

did knowingly and intentionally distribute and possess with intent to  
distribute methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

**COUNT 11**

21 U.S.C. § 841(a)(1)  
(Distribution of Methamphetamine)

On or about March 18, 2024, in Luzerne County, within the Middle  
District of Pennsylvania, the defendant,

**RYAN MEDAR,**

did knowingly and intentionally distribute and possess with intent to distribute methamphetamine, a Schedule II controlled substance, a separate offense from Count 10.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

**COUNT 12**  
18 U.S.C. § 933(a)(1)  
(Firearms Trafficking)

On or about March 18, 2024, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

**RYAN MEDAR,**

did transfer a firearm, namely a black Colt Government Model .22 handgun, Serial Number LK020676, to another person known to the Grand Jury, in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, or possession of the firearm by the person known to the Grand Jury would constitute a felony.

In violation of Title 18, United States Code, Section 933(a)(1).

THE GRAND JURY FURTHER CHARGES:

**COUNT 13**

18 U.S.C. §922(g)(1)  
(Felon in Possession of a Firearm)

On or about March 18, 2024, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

**RYAN MEDAR,**

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, namely, black Colt Government Model .22 handgun, Serial Number LK020676, said firearm having been shipped and transported in interstate commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

THE GRAND JURY FURTHER CHARGES:

**COUNT 14**

21 U.S.C. § 841(a)(1)  
(Distribution of Cocaine)

On or about March 26, 2024, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

**PATRICK RUSSIN,**

did knowingly and intentionally distribute and possess with intent to distribute cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

**COUNT 15**

21 U.S.C. § 841(a)(1)  
(Distribution of Cocaine)

On or about March 28, 2024, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

**PATRICK RUSSIN,**

did knowingly and intentionally distribute and possess with intent to distribute cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

THE GRAND JURY FURTHER CHARGES:

**COUNT 16**

21 U.S.C. § 841(a)(1)

(Distribution of Methamphetamine)

On or about March 31, 2024, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

**PATRICK RUSSIN,**

did knowingly and intentionally distribute and possess with intent to distribute 50 grams and more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

Before **PATRICK RUSSIN** committed the offense charged in this Count, **PATRICK RUSSIN** had a final conviction for a serious violent felony, namely a conviction under 18 Pa. C.S.A. §3701(a)(1)(ii), Robbery, (Case No. CP-40-CR-3356-2003), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

THE GRAND JURY FURTHER CHARGES:

**COUNT 17**

21 U.S.C. § 841(a)(1)

(Distribution of Methamphetamine)

On or about April 4, 2024, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

**RYAN MEDAR,**

did knowingly and intentionally distribute and possess with intent to distribute 50 grams and more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

THE GRAND JURY FURTHER ALLEGES:

**FORFEITURE ALLEGATION**

The allegations contained in Counts 1 through 17 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code, Section 2461(c) and Title 21, United States Code, Section 853.

Pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), Title 18, United States Code, Section 922(j), Title 18, United States Code Section 933(a), Title 18, United States Code, Section 924(c), Title 21, United States Code, Section 841(a)(1), and Title 21, United States Code, Section 846, the defendants,

**JAMIE SMICHERKO, PATRICK RUSSIN, RYAN MEDAR,  
and CARLOS LAUREL,**

shall forfeit to the United States of America any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of said offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses; and any firearms and ammunition involved in the commission of the offenses. The property to be forfeited includes, but is not limited to, the following:

- a. A black Taurus 1911 .45 caliber pistol, Serial Number ADH633998; and
- b. A brown Glock 19X 9mm pistol, Serial Number BRRA692; and

- c. A black Colt Government Model .22 handgun, Serial Number LK020676.

If any of the forfeitable property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code, Section 2461(c) and Title 21, United States Code, Section 853.

A TRUE BILL

GERARD M. KARAM  
United States Attorney

  
\_\_\_\_\_  
JAMES M. BUCHANAN  
Assistant United States Attorney

04/9/24  
Date